

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

DAVID HOUGH; SEE ATTACHED

*Plaintiff(s)*

v.

RYAN CARROLL; SEE ATTACHED

*Defendant(s)*

Civil Action No. 2:24-cv-02886-WLH

SUMMONS IN A CIVIL ACTION

To:

Ryan Carroll, Yax Ecommerce LLC, WA Amazon Seller LLC, WA Distribution LLC, a Dreams To Reality LLC, each at the address 2900 NE 7th Ave, Unit 2502, Miami, Florida 33137.

Max K. Day, Precision Trading Group, LLC, Providence Oak Properties, LLC, MKD Investment Advisor, LLC, MKD Family Beneficiary, LLC, MKD Family Private Management Company, LLC, Max Day Consulting, LLC, HouTex Farm Equity Partners LLC, Business Financial Solutions Advisory LLC, Evo Maxx LLC, and Yax IP and Management Inc., each at the address 18210 Farnsfield Drive, Houston Texas 77084;

Max O. Day at the address 3118 Brandon Hill Lane, Sugar Land, Texas 77479.

Michael Day and WWKB LLC, at the address 25010 Ginger Ranch Drive, Katy, Texas 77494:

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Nico Banks (attorney for Plaintiffs)  
712 H. St. NE  
Unit 8517  
Washington, DC 20002

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Nico Banks, Esq.  
[nico@bankslawoffice.com](mailto:nico@bankslawoffice.com)  
Filing on behalf of all Plaintiffs  
CA Bar No. 344705  
Banks Law Office  
712 H St NE,  
Unit #8571,  
Washington, DC 20002  
Tel.: 971-678-0036

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH;	)	Case No.: 2:24-cv-02886
MOULOUD HOCINE;	)	
JENNIFER LEHMKUHL HILL;	)	<b>COMPLAINT FOR:</b>
AMUND THOMPSON;	)	<b>1. FRAUD CONSPIRACY</b>
PAUL PANICO	)	<b>2. FRAUDULENT TRANSFERS</b>
	)	<b>IN FURTHERANCE OF</b>
Plaintiffs,	)	<b>CONSPIRACY</b>
vs.	)	<b>3. CONSPIRACY TO VIOLATE</b>
	)	<b>BUSINESS AND</b>
RYAN CARROLL;	)	<b>PROFESSIONS CODE § 17200</b>
MAX K. DAY;	)	<b>4. VIOLATIONS OF</b>
MAX O. DAY;	)	<b>SECURITIES LAWS</b>
MICHAEL DAY;	)	
YAX ECOMMERCE LLC;	)	
PRECISION TRADING GROUP, LLC;	)	<b>DEMAND FOR JURY TRIAL</b>
WA DISTRIBUTION LLC;	)	
PROVIDENCE OAK PROPERTIES,	)	
LLC;	)	
WA AMAZON SELLER LLC;	)	
MKD INVESTMENT ADVISOR, LLC;	)	
MKD FAMILY BENEFICIARY, LLC;	)	
MKD FAMILY PRIVATE	)	
MANAGEMENT COMPANY, LLC;	)	
MAX DAY CONSULTING, LLC;	)	
HOUTEX FARM EQUITY PARTNERS	)	
LLC;	)	

1 BUSINESS FINANCIAL SOLUTIONS  
2 ADVISORY LLC;  
3 EVO MAXX LLC;  
4 YAX IP AND MANAGEMENT INC.  
5 (D.B.A. "FULFILLABLE");  
6 WWKB LLC;  
7 DREAMS TO REALITY LLC;  
8  
9 Defendants.

10 Plaintiffs—Molund Hocine; Jennifer Lehmkuhl Hill; Amund Thompson;  
11 David Hough; and Paul Panico—by and through their undersigned attorney, hereby  
12 bring this action against Defendants—Ryan Carroll; Max K. Day; Max O. Day;  
13 Michael Day; Yax Ecommerce LLC; Precision Trading Group, LLC; WA  
14 Distribution LLC; Providence Oak Properties, LLC; WA Amazon Seller LLC; MKD  
15 Investment Advisor, LLC; MKD Family Beneficiary, LLC; MKD Family Private  
16 Management Company, LLC; Max Day Consulting, LLC; HouTex Farm Equity  
17 Partners LLC; Business Financial Solutions Advisory LLC; Evo Maxx LLC; Yax IP  
18 and Management Inc; Dreams To Reality LLC; and WWKB LLC—and allege as  
19 follows:  
20  
21  
22

### 23 **JURISDICTION AND VENUE**

- 24 1. Plaintiffs invoke the diversity jurisdiction of the Court pursuant to 28 U.S.C. §  
25 1332 because no Plaintiffs in this action reside in the same state as any  
26 Defendants, and the amount in controversy in each Plaintiff's claim exceeds  
27 \$75,000.  
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